

Received & Inspected

# Garden Valley Telephone Company

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ERSKINE, MINNESOTA 56535-0259

FEB 13 2012



Mail Room

George W. Fish  
General Manager

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An Equal Opportunity Employer

## Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2011

Date filed: **February 8, 2012**

Name of Company covered by this certification: **Garden Valley Telephone Company**

Form 499 Filer ID: **803319**

Name of signatory: **Joe O. Sandberg**

Title of signature: **Treasurer**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

Re: **EB Docket No. 06-36**

I, Joe O. Sandberg, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Included in this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

### CPNI Statement for Garden Valley Telephone Company

Garden Valley Telephone Company ("Garden Valley") has established operating procedures that ensure compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

Garden Valley has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

Garden Valley continually educates and trains its employees regarding the appropriate use of CPNI. Garden Valley has established disciplinary procedures should an employee violate the CPNI procedures established by Garden Valley.

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Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

Garden Valley has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Garden Valley's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that "opt out" elections are recorded and followed. No target marketing campaigns were conducted in 2011.

Our company has not taken any actions against data brokers in the past year. Garden Valley has encountered no specific instances of pretexting in 2011, but is continuing to educate employees to verify the identity of anyone who requests access to any information covered by CPNI rules. Training includes the requirement to report any attempts at pretexting to the company's CPNI compliance officer.

Our company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

**Safeguards:**

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

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Our company has established password protection for customers' online accounts.

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

**Recordkeeping and Reporting**

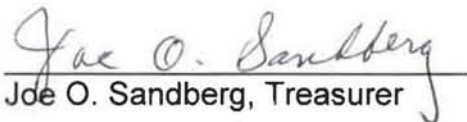
Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of any intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after seven business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.

Our company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. Our company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Sincerely,

  
Joe O. Sandberg, Treasurer

JOS/lh

C: Best Copy and Printing, Inc.